

**Dougherty v. AMCO - Discovery Disputes - Updated 3/27/08**

<b>Party</b>	<b>Issue</b>	<b>P's position</b>	<b>D's position</b>
<b>P</b>	PMK Witness re: Subject Area No. 6 (reserves), P's Notice of Deposition of D.	Witness produced 3/6/08 not knowledgeable; 3/10/08 demand to produce PMK. See 3/10/08 and 3/20/08 correspondence.	No response addressing this issue.
<b>P</b>	Colossus Report prepared by D in evaluating P's UIM claim.	D has duty to acquire from 3 <sup>rd</sup> party (CSC) and produce in response to P's 1 <sup>st</sup> RPD. See 3/5/08 and 3/20/08 correspondence.	No response addressing this issue.
<b>P</b>	P's 1 <sup>st</sup> RPD Nos. 5, 12, 13, 14, 16, 17, 19, 20, 21, 22, 23, 24, 25, and 26.	D's response to P's 1 <sup>st</sup> RPD stated additional documents would be produced once protective order in place. See 3/5/08 and 3/21/08 correspondence.	Will review and evaluate; will produce any outstanding documents ASAP. See 3/6/08 correspondence.
<b>P</b>	D's Privilege Log No. 2 Item No. 4	Redaction re: subrogation information; neither trade secret nor proprietary. See 2/7/08 and 3/21/08 correspondence.	No response addressing this issue.